

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA

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|---------------------------|---|------------------------------|
| IN RE: |) | |
| |) | |
| JOSE J. SANTILLAN-RAMOS |) | |
| SANDRA B. SANTILLAN-RAMOS |) | |
| |) | Bankruptcy Case No. 08-50011 |
| Debtor(s) |) | |
| |) | CHAPTER 13 |

**DEBTOR'S RESPONSE TO THE MOTION FOR RELIEF OF STAY FILED BY
EMC MORTGAGE CORPORATION (EMC)**

COMES NOW THE ABOVE NAMED DEBTORS, by and through her attorney of record alleges and says:

1. The debtors object to the Motion for Relief of Stay filed by EMC.
2. The Debtor requests a hearing in this matter.
3. The Debtor requests that the Creditor have and receive nothing of their action.

This day of February 2, 2009

Respectfully submitted,

/s/ Thomas C. Flippin
Thomas C. Flippin
Attorney for Debtors
NC State Bar 29210
PO Box 429
1435 North Bridge Street
Elkin, NC 28621
(336) 526-2280
tom@flippinlaw.com

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CERTIFICATE OF SERVICE

This is to certify that the undersigned has this date served this **Debtor's Response to the Motion for Relief of Stay**, in the above-entitled action by depositing a copy hereof enclosed in a post paid wrapper in a post office or official depository under the exclusive care and custody of the United Parcel Service properly addressed to the attorney in this matter.

This day of February 2, 2009

/s/ Thomas C. Flippin
Thomas C. Flippin
NC State Bar 29210
PO Box 429
1435 North Bridge Street
Elkin, NC 28621

SERVED UPON:

Joseph J. Vonnegut
PO Box 2505
Fayetteville, NC 28302

Jose and Sandra Santillan Ramos
2483 Boone Trail
North Wilkesboro, NC 28659

By ECF:

John Bramlett Bankruptcy Administrator

Steven Tate Standing Chapter 13 Trustee